

LYONS & FLOOD, LLP
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Attorneys for Defendant / Third-Party Plaintiff
MARINE BULKHEADING, INC.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LEVEL 3 COMMUNICATIONS, L.L.C. and
MCI COMMUNICATIONS SERVICES, INC.,
d/b/a VERIZON BUSINESS,

ECF CASE

07 Civ. 8118 (GEL)

Plaintiffs,

- against -

MARINE BULKHEADING, INC.,

Defendant,

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MARINE BULKHEADING, INC.,

Third-Party Plaintiff,

- against -

408-140 GREENWICH STREET LLC, BASILE
BUILDERS GROUP, INC. and CHAMP
CONSTRUCTION CORP.,

Third-Party Defendants.

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REPLY TO 408-410 GREENWICH STREET, LLC'S COUNTER-CLAIMS

Defendant / Third-Party Plaintiff, MARINE BULKHEADING, INC. ("MBI"), by and through its attorneys, Lyons & Flood, LLP, as and for its Reply to Third-Party Defendant 408-410 GREENWICH STREET LLC's ("GREENWICH") Counter-Claims alleges, upon information and belief, as follows:

1. Denies the allegations contained in paragraphs 52 and 53 of GREENWICH's Answer and Counter-Claims.

REPLY TO SECOND COUNTER-CLAIM

2. Admits the allegations contained in paragraph 54 of GREENWICH's Answer and Counter-Claims.

3. Denies the allegations contained in paragraphs 55 and 56 of GREENWICH's Answer and Counter-Claims.

REPLY TO THIRD COUNTER-CLAIM

4. Admits the allegations contained in paragraphs 57 and 58 of GREENWICH's Answer and Counter-Claims.

5. Denies the allegations contained in paragraph 59 of GREENWICH's Answer and Counter-Claims.

FIRST AFFIRMATIVE DEFENSE

6. Defendant / Third-Party Plaintiff MBI repeats and realleges each and every allegation contained in the Third Party Complaint filed herein.

SECOND AFFIRMATIVE DEFENSE

7. Third-Party Defendant GREENWICH's Counter-Claims fail to state a claim upon which relief can be granted.

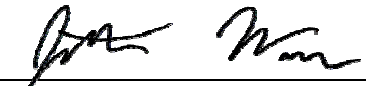
WHEREFORE, Defendant / Third-Party Plaintiff MBI prays that:

- a. judgment be entered by this Court against GREENWICH and in favor of Defendant / Third-Party Plaintiff MBI, dismissing GREENWICH's Counter-Claims; and
- b. judgment be entered by this Court in favor of Defendant / Third-Party Plaintiff MBI for such other, further, and different relief as this Court may deem just and proper.

Dated: January 17, 2008

LYONS & FLOOD, LLP
Attorneys for Defendant / Third-Party Plaintiff
MARINE BULKHEADING, INC.

By:



Jon Werner (JW-5000)
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CERTIFICATE OF SERVICE

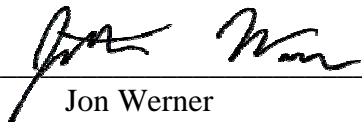
Jon Werner, an attorney duly admitted to practice before this Honorable Court, affirms on this 17th day of January 2008, I served true copies of the foregoing, by U.S. Mail, first-class postage pre-paid, to:

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